

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 21-cr-10018-PBS
)	
GANG CHEN)	
)	
)	
Defendant.)	
_____)	

**PROFESSOR GANG CHEN’S UNOPPOSED MOTION TO
MODIFY PRETRIAL CONDITIONS TO ALLOW TRAVEL
TO CALIFORNIA**

Professor Gang Chen respectfully requests this Court modify his conditions of pretrial release to allow him to travel to California on December 6 through December 9 for an academic conference. Professor Chen has alerted U.S. Probation of the travel and will check in with U.S. Probation as prescribed by that office. The Government and U.S. Probation has informed counsel that they do not object to the travel.

Respectfully submitted,

GANG CHEN

By his attorneys,

/s/ Robert A. Fisher

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Dated: November 26, 2021

LOCAL RULE 7.1(A)(2) CERTIFICATION

I hereby certify that I conferred with counsel for the government in an attempt to resolve or narrow the issues raised by this motion and the government has notified me that it does not oppose the motion.

/s/ Robert A. Fisher

CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing was filed electronically on November 26, 2021, and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Robert A. Fisher